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2025 MAY 20 PM 2:59

UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA  
LOS ANGELES

BY: *[Signature]*

ea

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7  
8 UNITED STATES DISTRICT COURT  
9 CENTRAL DISTRICT OF CALIFORNIA

10  
11 Robert L. Manning,

12 2:25-cv-04532-MEMF(BFMx)  
13 Plaintiff,

14 vs.

15 Westlake Financial Services, LLC, Fred

16 Loya Insurance Agency, Inc., a.k.a. Loya

17 Casualty Insurance Company, Diaz Avilez

18 Ernesto, an individual, Wells Fargo Bank,

19 National Association,

20 Ismael Hernandez, an Individual, ISH Auto

21 Craft Corporation, a.k.a. Schraders Auto

22 Craft, Ron Sachs, an individual,

Defendants,

and does one through ten,

23 Defendant (s.)

18 U.S. Code § 1341  
(Frauds and Swindles)

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COMPLAINT

- 1
- 2 1. Plaintiff, Robert L. Manning (hereinafter "Plaintiff") is and at all times herein  
3 mentioned, was a resident of the City of Los Angeles, County of Los Angeles, and  
4 State of California.
- 5 2. The Plaintiff is informed and believes, and based upon such information and belief,  
6 thereon alleges, Defendant Westlake Financial, LLC., was and is and at all times  
7 mentioned, is doing business in the Jurisdiction where allegations are being  
8 alleged, situated at: 4751 Wilshire Blvd., Los Angeles, California, 90010, Los  
9 Angeles County (hereinafter "Westlake")
- 10 3. The Plaintiff is informed and believes, and based upon such information and belief,  
11 thereon alleges Defendant Fred Loya Insurance Agency, a.k.a., Loya Casualty  
12 Insurance Company, was and is and at all times mentioned, doing business in  
13 California based in Texas: 1800 Lee Trevino, El Paso, Texas, 79936 (hereinafter  
14 "Fred Loya").
- 15 4. The plaintiff is informed and believes and based upon such information and belief,  
16 thereon alleges that, Defendant Diaz Avilez Ernesto, an individual, caused the  
17 accident in Compton, California, and resides at:
- 18 5. The plaintiff is informed and believes and based upon such information and belief,  
19 thereon alleges that Defendant (s), Wells Fargo Bank, National Association, is  
20 doing business in California, situated at: Corporation Service Company (CSC)  
21 Gateway Oaks Dr. #150 N., Sacramento, California, 95833 (hereinafter "Wells  
22 Fargo").
- 23
- 24 6. Plaintiff is informed and believes and based upon such information and belief,  
25 thereon alleges that Defendant, Ismael Hernandez, an individual, did and still is  
26 working at: 950 West Foothill Blvd., #4, Azusa, CA, 91702 (hereinafter "Ismael  
27 Hernandez").
- 28

- 1       7. The plaintiff is informed and believes, and based on such information and belief,  
2                  thereon alleges that, defendant (s) ISH Auto Craft Corporation a.k.a. Schraders  
3                  auto Craft, is sued herein and are in some manner responsible for acts of Fraud  
4                  and Swindles, situated at: 950 West Foothill Blvd., #4, Azusa, California, 91702.
- 5       8. Plaintiff is informed and believes, and based on such information and belief,  
6                  thereon alleges that, defendant Ron Sachs is working in concert with alleged  
7                  conspiracy of Fraud and Swindel as alleged, situated at: Lien Sale Service, P. O.  
8                  Box 9334, N. Hollywood, California, 91609.
- 9       9. At all times herein mentioned, Plaintiff is informed and believes and, based on such  
10                 information and belief thereon alleges that Defendants, and each of them, were  
11                 agents, employees and servants of each other and were acting within the course  
12                 and scope of said agency, employment or service, and with the permission and  
13                 consent of each other defendants.
- 14      10. Plaintiff will amend this complaint as to the as does one through ten, upon obtaining  
15                 pending information.

1  
2 9. On 12-02-24, defendant Diaz Avilez (DMV Record / Ernesto Diaz Avilez: Loya Casualty  
3 Insurance Company, Record) hit Plaintiff's vehicle near 4300 East Compton, California, 90221,  
4 causing damages to the vehicle, and injuries to Plaintiff.

5 **(See exhibit A: Fred Loya estimate)**

6 10. Plaintiff, having been injured and suffering from varies medical injuries, granted his dad and  
7 "star" witness authorization to handle all of his automobile affairs. Plaintiff's "star" witness soon  
8 discovered that defendant Ernesto Diaz Avilez had filed a False Claim against his and Plaintiffs'  
9 insurance company claiming he was not at fault. However, after Plaintiff sent the "star" witness  
10 evidence that this was not true, the "star" witness then sent this information to the defendant's  
11 insurance company, defendant Fred Loya Insurance Company / defendant Loya Casualty  
12 Insurance Company. And defendant Fred Loya began investigating, however, and mind the  
13 Court, as this point in the Claim, defendants Ismael Hernandez and Schraders Auto Craft is  
14 charging defendant Fred Loya the Legal amount allowed under California Law, according to the  
15 defendant, which is \$200.00 per day for (Total Loss Amount) the storage fees. Nor are these  
16 fees to legally be allocated onto Plaintiff either, according to California Law.

17 11. On or about 12-16-24, 3:13 pm, Pacific Time, defendant Fred Loya's employee, Mr. Hose,  
18 identification number: 11910 stated, in Part (Laughing after receiving the truth from Plaintiff):  
19 "Fred Loya Insurance Company would like to extend our apologies for our insured Ernesto Diaz  
20 Avilez. We are accepting full liability, no worries about that. You should be receiving a call from  
21 our property damage department real soon now." **(See A)**

22 12. On or about 01-22-25, defendant Fred Loya Insurance Company's employee, Mr. Miguel  
23 Garcia (956) 393-2717, stated that defendant Fred Loya needed to inspect the vehicle at the  
24 body shop before they could make any type of offer to repair the vehicle. Plaintiffs' "star"  
25 witness, again, sent over the body shop's contact information, defendants: Ismael and  
26 Schraders Auto Craft. A few days had later, the "star" witness called defendants Fred Loya (Mr.  
27 Miguel Garcia) to confirm their inspection at the body shop? The defendant then stated, in part:  
28

1 "Oh! We're going to use our own "Process." Plaintiff's "star" witness then interrupted the  
2 defendant, in part: "Sir, I gave you what you asked for to go out and check the car properly, did  
3 you do that?" Defendant Fred Loya (Mr. Miguel Garcia), in part: Oh! We don't have agents that  
4 go that far out to places like the Congo boondockies! (The "star" witness took this as a racial  
5 slur). He continued, in part: "Someone from our total loss dept will contact you!" He then hung  
6 up.

7 13. Immediately, the "star" witness called defendant Ismael Hernandez, and asked "if he ever  
8 had any Fred Loya situations whereas they came out and inspected cars of clients of his,  
9 because Fred Loya just said his shop is too far. The Congo Boondoockies? Defendant Ismael  
10 Hernandez / defendants Schraders Auto Craft, stated, in part: "He said what? He's lying. We  
11 have Fred Loya crooks out here all the time inspecting cars. I have a list of them I can prove.  
12 Bro, they're playing you. This is just like your AAA situation when someone hit your car a few  
13 years back, they didn't pay you then either. Bro, I think they have some crooked systematic stuff  
14 going against you ... I've never experienced the type of resistance you're receiving in similar  
15 situations. No disrespect, but ever since you should me that stuff you're doing with your  
16 inventions and stuff, I think you're right. They're stealing your intellectual properties and  
17 everything around you to keep you down. Bro, they're making your whole life unfair. I can only  
18 imagine. Pont taken: remember when AAA wanted to get to the "Crash Box?" I never got that  
19 from insurance companies until your situation. And think about it. Why didn't Fred Loya do the  
20 same, come down to my Them and Westlake Financial. And that "Crash Box???" Man, that's  
21 privacy violation. They're placing these boxes in people's cars without telling them that they're  
22 there, that's illegal; the dealerships, the car lots, all of them. Kind of like that Brainwave  
23 Colorado Act you told me about. All that! And You know why, because they're doing Fraud.  
24 This is way past the "Siri" and "Alexus" class action lawsuits. They're listening in just to steal,  
25 that's how they knew to steal the "Repair" check. I bet Judges from everywhere doesn't have a  
26 clue about a "Crash Box." And the ones that do, watch out! On thing is for sure, you didn't just  
27 stumble across light speed vehicles in that military document you have – they didn't get that to  
28 you until 6 years later. Again, that's more Fraud and Swindel evidence. Then the Fred Loya's

1 "pick up" dept. ((915) 444-1061). You know they kept trying to come down here and get the car  
2 without your authorization – GTA! Yeah, I moved the car ...and I know I should have told you.  
3 My bad, I was wrong for that. But all that ...Fred Loys never requested to come out to capture  
4 "Crash Box" data on the "Audi." They didn't have to necessarily go straight to the frame right  
5 now, they could have come out and taken pictures and then plugged into the OBM and seen  
6 that their insured caused what damages to what area, how bad it was, and what percentage  
7 towards being deemed a total loss. If they deem the car a total loss especially some "process"  
8 and not coming to look at the car for themselves like they always do. That tells me Fraud is the  
9 horizon, that they're conspiring together, and something and someone diverted them from  
10 coming. They said they don't drive out to the CONGO BOONDOCKIES? That's crazy and  
11 racist!" See 18 USC / RICO.

12 14. The attorney handling Plaintiffs' bodily injuries is: Noravian Law Firm. Noravian Law Firm will  
13 be testifying on behalf of the Plaintiff and showing how defendant Fred Loya Insurance  
14 Company is a Fraudulent behaving Company especially to black people. That they conspire  
15 against blacks all the time along with all of the defendants with their respective business  
16 dealings, appearing to be in bed together. They are currently trying to expedite Plaintiff's case  
17 so that defendant Scheders Auto Craft will not wrongfully take Plaintiffs' car for storage fees, in  
18 which defendant Ismael Hernandez himself stated Plaintiff does not owe him. Again, according  
19 to defendant Ismael Hernandez, defendant Fred Loya owes him for the storage. However, after  
20 defendants: Ismael Hernandez, defendants Ron Scabs, Schraders Auto Craft, and Lien Sales  
21 Services filed documents with the department of motor vehicles (DMV), this seems like a lie.

22 **(See exhibit B: defendant Schraders paperwork)**

23 Plaintiff's "star" witness witnessed Defendant Ismale Hernandez and defendant Westlake  
24 Financial on the telephone aprox. one week prior before defendant Fred Loya mailed out the  
25 "Repair Check." The "meeting of the minds" so to speak, defendant Westlake Financial was to  
26 release the "Repair" check to defendant Ismale Hernandez and defendant Schraders Auto Craft  
27 after defendant Ismael Hernandez and defendant Schraders Auto Craft submitted Internal  
28 Revenue Service (IRS) W-9 paperwork; the original estimate; and other documents defendant

1 Westlake Financial requested from defendant Ismale Hernandez, and defendant Schraders  
2 Auto Craft. Defendant Westlake Financial, in part:" After we've received all those documents,  
3 and after you've proven that you've completed 90% of the "Repairs," Westlake Finical will send  
4 over the "Repair" check." At first defendants Ismale Hernandez appeared to have had a problem  
5 with defendants' demands for him to have 90% of the work completed, but he then stated "he  
6 had no problem with it." He agreed to the terms, but he [never] met the terms yet he's falsely  
7 seeking money from the Plaintiff. Plaintiff contacted the "star" witness to get an update.

8 However, the "star" witness "RLMJTK," discovered that defendant Ismael Hernandez and  
9 defendant Schraders Auto Craft never done anything to Plaintiff's vehicle besides move it to an  
10 unknown location without their authorizations. In fact, the vehicle is still in an unknown location.  
11 This is a violation of the original agreement Plaintiff made with defendant Ismael Hernandez,  
12 and defendant Schraders Autocrat. In fact, defendant Ismael Hernandez violated Laws that  
13 could be misconstrued as violating California Penal Code 487 (d)(1), up to and including Frauds  
14 and Swindells **18 USC § 1341 (further explained: hereon throughout)** .

15. Sometime soon after 02-14-25 defendant Westlake Financial asked Plaintiff to endorse the  
16 check to them so that they could proceed with paying the body shop. However, when the "star"  
17 witness arrived, defendant Westlake Financial had defendant Wells Fargo and their colleagues  
18 to Forge and or commit Fraud and or endorsed the "Repair" check without it being Legally  
19 endorsed. This was nothing less than malicious. With all of his on time car payment never late  
20 on payment even to this day, Plaintiff has never been behind on car payments. Defendant Fred  
21 Loya has proven shown the appearance of conspiring so that they too could get a piece of the  
22 money and or the vehicle. And defendant Wells Fargo, who taken the initial complaint after  
23 they're the party on top of the "Repair" check – the check has to "Clear" through them, they are  
24 in Violation: Penal Code 476, and 18 USC § 1004, § 18341, §1349, and §1343 – "Wire Fraud  
25 (s)."

26 **(exhibit C: "Repair Check" / none endorsement)**

27 16. Basically, and according solely to the "star" witness, after defendant Wells Fargo agreed that  
28 defendant Westlake Financial conducted a fraudulent Act, sometime later defendant Wells

1 Fargo discovered they had some dealings with the "star" witness in the past. And not completing  
2 their investigation of the "Repair" check and it not being properly endorsed, and or closing their  
3 investigation on Fraud they were first adamant about, it was and or is retaliation. In support:  
4 Defendant Wells Fargo was engaged in a major Fraud and conspiracy involving a inside "wire"  
5 Fraud job. The enclosed banking transaction totaling \$1,851,508.00, Real Property "Mineral  
6 Rights" owned by the "star" witness, became mixed up in alleged embezzlement. As defendant  
7 Wells Fargo and Lawyer's Title (Orange County) in conjunction with Chicago Title's Dave  
8 Balassi, taken the "star" witness "Mineral Rights" off of APN 6038-0-004-002 – APN, and placed  
9 APN 6038-047-002 in its stead so that the Loans in escrow could appear "Clear Title."  
10 According to Plaintiffs' "star" witness, the "star" witness was falsely questioned by the Federal  
11 Bureau of Investigations Agents (FBI), and or falsely imprisoned as to his connection to the \$1.8  
12 Million dollar that defendant Wells Fargo appears to be embezzling? According to the FBI,  
13 relative to the Legal "Mineral Rights" deed they had pulled from the County registrars, they  
14 wanted to know the "star" witnesses connections to the real property? Slamming down  
15 documents to combat the FBI's appearance of viewing the "star" witness as some guilty party,  
16 which he's far from, the "star" witness then stated, in part: "After the 110 Freeway expansion  
17 project escrow was opened, and the relocation of that transaction taken place. However, a part  
18 of that deal was that we [shall] retain 100% ownership of our "Mineral Rights," potential  
19 hydrocarbons or whatever it may or may not be, situated 500 Feet underneath the real property.  
20 Thus, the State of California's acquisition dept., at the time, had "no problem" with that and  
21 made all of the necessary signed documents. In fact, documents you already have in your  
22 hands. After I found out someone had taken [my] "Mineral Rights" deed – probably worthless,  
23 but the principle, off title to 8925 South Flower Street, Los Angles, California, 90003, I traced the  
24 Fraud to Orange County, Lawyer's Title" (Mr. Glenn in Orange County in conjunction with  
25 Chicago Title's Dave Balassi in Los Angles California last known address, situated at the  
26 famous 777 Figuereo / 777 Tower Building). And the bank that conducted the transaction was  
27 the Bank of Orange County. A bank I soon discovered was also a Fraud. As the bank building  
28 itself traced all the way to Fountain Valley, California, and, in fact, the Fountain Valley Police

1 Dept. FBI, in part: "Did you file a complaint with the Fountain Valley Police Dept.?" The "star"  
2 witness handed the agents the Fountain Valley Polices' business card with incident number, the  
3 deed, and also [with] defendant Wells Fargo's name on it. According to the Police Officer who  
4 took the Report of real property APN 6038-0047 really APN 6038-004-002, he said: 'this seems  
5 like some serious stuff here, sir. This is above my pay grade. You might want to contact the FBI  
6 with this. Also, you might wanna be careful with this type of criminal activity.' " The "star"  
7 witness" continued, in part: "Actually, I pretty mush knew that especially considering the  
8 Chicago Title/Dave Balassi component, whereas his Lawyer Susan Hutchison was mailing me  
9 court papers thru the United States Postal Service with white powdery, Ricin like substances in  
10 it, followed by people following me around pumping "Fumes" wherever I sleep. The building  
11 manager caught 2 of them on video, running carrying pumping apparatuses with tubes and  
12 chemicals, and or the Li Xuming terrorists model. I almost caught a few myself, but they too  
13 jumped into a vehicle and blurted away."

14 **(exhibit D: Wells Fargo documents)**

15 17. The Agents looked at the "star" witness then proceeded to leave: "Sorry for your  
16 inconvenience and the mistaken identity." For a moment there, the "star" witness gazed at the  
17 Agents as they walked away to their very tinted vehicle, thinking to himself: "all those / these  
18 times, all of the conspiring Acts. Not one. Not one evil person have they approached me with,  
19 up to and including those within their agencies. Yet, they approach me over money they think I  
20 may have gotten amidst their alleged conspiracies, Wow." Still to this day the "star" witness has  
21 yet to receive any type of receipt, and or similar to the 2001 FBI Agent Meredith A. Burke Report  
22 (s)- missing still to this day – interrupting the "star" witness's owed pension. Boeing Aircraft  
23 Company **BEMSID: 91593.**

24 18. In Closing: all the defendants conducted alleged and or actual "Fraud" and "Swindling" Acts,  
25 amidst an already racists environment their added "snake oil" approaches. The Plaintiff will  
26 prove all of these occurrences and or Acts and or alleged Acts, were and are all meant to steal  
27 money and everything of worth to Plaintiff.

1       19. According to the evidence gathered by the "star" witness that will be presented at time of  
2       Jury Trial, it is "clear" and very obvious that none of defendants have the Plaintiff's best interest,  
3       nor do any of them like the "star" witness. Someone who has experienced and proven many  
4       times over all of the discriminatory (alleged) systematic and proven acts of thefts over the years;  
5       and or such that illustrated hereon and throughout. The defendant Westlake Finical violated  
6       Federal Law as it pertains to Frauds and Swindles when they cashed Plaintiff's check without  
7       Plaintiff endorsing the "Repair" check. Their Violations include but are not limited to: 18 USC  
8       §1341. And then defendant Fred Loya Insurance committed "wire Fraud" along with said  
9       defendants, when they wrongfully printed the check without conducting a visual and  
10      professional audit required by Law.

11     20. Defendant Fred Loya Insurance stated that in order for them to send this type of money over  
12      the wire, they have to abide by Federal Laws and audit the physical damages. Defendant Fred  
13      Loya violated Federal law when they chose to utilize their own "process" in it's place – then  
14      deeming the vehicle a total loss which without looking at it. IT IS NOT. Defendant Fred Loya  
15      knew exactly what they were doing in this particular situation, alleged theft by way of Fraud and  
16      Swindling involving this unknown and Last second presented "process' they never warned  
17      anyone of. This process can only be found with one insurance company as such, defendant  
18      Fred Loya. If this is such a special "Process" as defined by defendant Fred Loya Insurance  
19      Company / Casualty, et al. state, then there has to be a way to trace it to Federal Law, the  
20      United States Patent Office, etc. It is not. And, they have constantly refused to produce  
21      evidence in these regards. In support: the defendants furthering with, in part: "Oh, we don't have  
22      agents who driveway out to the Congo Boondockies!" Yet defendant Ismael Hernandez stated  
23      "he has done business with matters involving defendants Fred Loya. That they're lying, and he  
24      has proof defendant Fred Loya has drove out to his shop numerous occasion to inspect  
25      vehicles."

26     21. Defendant Ron Sachs and defendants Lien Sales Services are in violation of 18 USC  
27      §1341, Fraud and Swindell. They clearly stated that the Department of Motor Vehicle "Will not  
28      start a Lien sale against plaintiff's "Audi" until 4 thru 6 months from the time defendant Ismale

Hernandez and defendants Schraders filed paperwork with them. That his colleagues and or business partners at Lien Sale Services and defendant Ron Sachs, and the Lady there who refuse to give her name, are all just conducting a Lien Sale to make defendant Fred Loya Insurance Company pay for the storages they're legally bound by the State of California to pay.

Further: defendant Ismael Hernandez and defendant Schraders Auto Craft [never] conducted a tear down of the Plaintiff's vehicle, but he's claiming even \$500.00 for that. Defendant Ismael Hernandez Violations: On one hand defendant Ismael Hernandez comes off as a good business person who have produced good autobody work in the past, why the "star" witness trusted him. Then on the other hand, said defendant moves the vehicle without the Plaintiffs' and or the "star" witnesses' authorization just when defendant Fred Loya Casualty Company began giving lots of problems, mind the Court, which they created themselves (they in fact delayed the entire process, apologizing each time their Acts / alleged Acts were called out by the "star" witness and or Plaintiff, each step of the way / being cornered, all that will be proven at time of Jury Trial, up to and including said defendant stating "They could not move FWD with the claim because they could not find or locate their insured, defendant Diaz Avilez Ernesto" even despite said defendant making 2 claims even before an always timely Plaintiff could make 1 claim. And when said defendant discovered his untruths were exposed, he suddenly became unable to locate yet somehow delaying the Ciam, which the Department of Insurance stated, in part: "They don't need him at this point to move FWD with the claim.") In fact, the "star" witness spoke with the Department of Insurance about the storage fess defendant Ismael Hernandez and defendant Schraders are seeking from defendant Fred Loya somehow now through Plaintiff. This further supports Plaintiff claims that defendant Ismael Hernandez and defendant Schraders Auto Craft, along with their friends and or defendants Ron Scahs and defendant Lien Sale Services as alleged and or actual "Fraud and Swindlers," violating 18 USC § 1341.

22. Further Violations: According to the "audio" evidence currently retained by the "star" witness, defendant Westlake Financials Ana Ramerez (Manager) was instructed by her superior Don Hankey to allegedly steal Plaintiffs' "repair" check. She stated that she was instructed to conduct an alleged Act of Fraud by way of this Fraud and Swindell to do it plead hereon and throughout.

1 The check in the exhibit clearly has the Plaintiffs' name on it, and the back of the check does not  
2 have the Plaintiff endorsing the check, nor was the Plaintiff behind on payments. This was a  
3 alleged criminal and illegal Act on behalf of said defendants. It was allegedly racial, and their  
4 actions manipulating Plaintiff for months into believing the "Repair" check was his, it was  
5 especially malicious nature. The words defendant Ana Rameriez stated her superior stated, in  
6 part: "These types of people don't pay their loans on time, take the check." There are no  
7 insinuations here. This is actual robbery – proven evidence: the cashed and un-endorsed  
8 "Repair" check.

9 23. All of the defendants have caused the Plaintiff great mental frustration throughout this entire  
10 process and continues to do so. The defendant has placed Plaintiff in a position of continued  
11 struggling. He's struggling to get back and forth to all the places he needs to get to, and all while  
12 being injured by the defendants.

13 24. The Plaintiff is a hardworking, respectful human being, someone with great mannerisms,  
14 and dignity. Plaintiff has been treated unfairly throughout this entire process since he was hit by  
15 defendant Diaz Avilez Ernesto on 12-02-24 and has been without a vehicle ever since. In the  
16 state of California, especially everything that's plead hereon and throughout, all the defendants  
17 have shown evidence of having purposely hindered Plaintiffs' "Right" to his "Privileges" to drive  
18 a motor vehicle. This is beyond unfair, and punitive damage are in Order, respectfully your  
19 honor.

20 25. To the United States District Court, Central District, Plaintiff feels that all of the defendants  
21 have proven themselves to commit alleged and or actual Fraud and Swindles, violations of the  
22 Statue 18USC 1341. Defendant Westlake Financial obvious endorsement of the "Repair"  
23 checks in "C" stands clear as well as all of the other defendants acting in concert with willful  
24 nature such as the unauthorized moving of Plaintiff's vehicle without his and or the "star"  
25 witnesses' permissions. Or as with defendant Diaz Avilez Ernesto suddenly becoming  
26 unreachable by defendants Fred Loya Insurance company – after causing the Plaintiff's car  
27 damages and injuries after having just filed 2 untrue insurance claims that were later overturned  
28 to the truth. As this appears to have caused him to go into hiding – not concerned with owing

1 the storage fees and or defendant Schraders and defendant Ismale Hernandez refusing to go  
2 after said defendant who actually owes the storage fees. It also looks discriminatory. All of the  
3 defendants were / are chasing the "Repair check as though it belongs to them when in actuality  
4 it belongs to the Plaintiff – supported by the evidence plead hereon and throughout. To the  
5 District Court: all element of the Statue has been satisfied:

6

7 The essential elements of an offense under 18 U.S.C. § 1341 are (1) the existence of a  
8 scheme to defraud; (2) the participation by the defendant in the particular scheme charged with  
9 the specific intent to defraud; and (3) the use of the United States mails in furtherance of the  
10 fraudulent scheme. United States v. Hannigan, 27 F.3d 890, 892 (3d Cir. 1994); see also United  
11 States v. Riley, 621F.3d 312 (3d Cir. 2010) (stating elements); United States v. Pharis, 298 F.3d  
12 228, 234 (3d Cir. 2002); United States v. Copple, 24 F.3d 535, 544 (3d Cir. 1994). In United  
13 States v. Pearlstein, 576 F.2d 531, 537 (3d Cir. 1978), the court explained that the prosecution  
14 must establish either that the defendant devised the fraudulent scheme or that the defendant  
15 "willfully participated in it with knowledge of its fraudulent nature."

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17 Jury Trial Demanded

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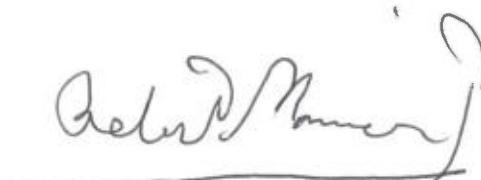
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Plaintiff, Pro Se

### Demand

1. For the Violation of Fraud and Swindles, 18 USC 1341, the Plaintiff seeks general damages in the amount of \$100,000.00 (One Hundred Thousand USD).
  2. Plaintiff seeks punitive damages for the violation of Fraud and Swindles, 18 USC 1342, in the amount of \$100,000.00 (One hundred dollars / USD).

**Declaration**

Plaintiff declares under penalty of perjury that to the best of his knowledge, he believes, while guided by the "star" witness in every aspect of this Claim and or the person responsible for delivering the truth to this Court, that the forgoing is true.

Dated: 05-20-24

Alex Dominy

Plaintiff, Robert L. Manning, in Pro Se

# LOYA CASUALTY INSURANCE COMPANY

P.O. Box 972450 El Paso, TX 79997  
 (800) 880-0472

January 27, 2025

72 / 810390691  
 ROBERT MANNING  
 6648 GALE AVE  
 LONG BEACH, CA 90805

RE: Policyholder : ERNESTO DIAZ AVILEZ  
 Claim Number : 72 - 0000472881  
 Date of Loss : 12/2/2024  
 Claimant : ROBERT MANNING  
 Vehicle : 2016 AUDI A320 WAVA7GFF8G1077995  
 Cause of Loss : Collision

Dear ROBERT MANNING:

Please be advised that your vehicle has been deemed a total loss. We have completed a market survey and after careful review have determined the Actual Cash Value (ACV) of your vehicle.

Below is the summary of your claim settlement

#### OPTION 1: TITLE RELEASE SETTLEMENT

- 1) To transfer ownership and possession of the vehicle to LOYA CASUALTY INSURANCE COMPANY.

If we pick up the vehicle:	\$ 8,260.00	(+)Base ACV Value
	\$ 0.00	(+)Prior Damage
	\$ 0.00	(+)Vehicle Condition
	\$ 0.00	(-)Tires
	<hr/>	<hr/>
	\$ 8,260.00	(=)ACV
	\$ 784.70	(+) Tax
	\$ 15.00	(+) DMV Fee
	\$ 83.00	(+) Vehicle License Fee Refund
	\$ 9.00	(+) Smog Fee
	<hr/>	<hr/>
	\$ 9,151.70	(=) Subtotal
	\$ 0.00	(-) Deductible
	\$ 0.00	(-) Comp Neg
	\$ 500.00	(-) Key
	\$ 0.00	(-) Loss Mitigation
	<hr/>	<hr/>
	\$ 8,651.70	(=) Subtotal
	\$ 0.00	(-) Initial repair Check
	<hr/>	<hr/>
	\$ 8,651.70	(=) Total Title Release
	\$ 0.00	(-) Payout to Lienholder
	<hr/>	<hr/>
	\$ 8,651.70	(=) Balance To Client

Exhibit A

#### OPTION 2: OWNER RETAIN SETTLEMENT



Schraders Auto Craft  
#:16  
Ismael@SchradersAutoCraft.com  
950 W Foothill Blvd Unit 4, Azusa, CA 91702  
Phone: (626) 506-0854

State EPA:

BAR:

**Final Bill****RO Number: 1246**

Customer: MANNING, ROBERT LAYFAETTE	Insurance: FRED LOYA INSURANCE AGENCY	Adjuster: Raquel - FRED Phone: (915) 629-6219 Other	Estimator: Create Date: 12/12/2024	ismael Hernandez
950 W FOOTHILL BLVD AZUSA, CA 91702 (213) 570-2518	LA PUENTE	Claim: 72-0000472881 Loss Date: Deductible:		

2016 AUDI A3 Premium FWD 4D SED 4-1.8L Turbocharged Gasoline Gasoline Direct Injection

VIN: WAUA7GFF8G1077995	Interior Color:	Mileage In:	Vehicle Out:
License:	Exterior Color:	Mileage Out:	
State:	Production Date:	Condition:	Job #:

Line	Ver	Operation	Description	Qty	Extended Price \$	Part Type	Labor	Type	Paint
1	TTL		STORAGE 12/12-1/23	42	8,400.00	Other			
2	TTL		TEARDOWN	1	595.00	Other			
3	TTL		DIGNOSTIC	1	100.00	Other			

Estimate Totals	Discount \$	Markup \$	Rate \$	Total Hours	Total \$
Miscellaneous					9,095.00
<b>Subtotal</b>					<b>9,095.00</b>
Sales Tax					0.00
<b>Grand Total</b>					<b>9,095.00</b>
<b>Net Total</b>					<b>9,095.00</b>

Estimate Version	Total \$
Original	11,532.75
Supplement TTL	9,095.00

Insurance Total \$:	9,095.00
Received from Insurance \$:	0.00
Balance due from Insurance \$:	9,095.00

Customer Total \$:	0.00
Received from Customer \$:	0.00
Balance due from Customer \$:	0.00

WE APPRECIATE YOUR BUSINESS.

T = Taxable Item, RPD = Related Prior Damage, AA = Appearance Allowance, UPD = Unrelated Prior Damage, PDR = Paintless Dent Repair, A/M = Aftermarket, Rechr = Rechromed, Reman = Remanufactured, OEM = New Original Equipment Manufacturer, Recor = Re-cored, RECOND = Reconditioned, LKQ = Like Kind Quality or Used, Diag = Diagnostic, Elec = Electrical, Mech = Mechanical, Ref = Refinish, Struc = Structural

Form **W-9**  
 (Rev. October 2018)  
 Department of the Treasury  
 Internal Revenue Service

# Request for Taxpayer Identification Number and Certification

► Go to [www.irs.gov/FormW9](http://www.irs.gov/FormW9) for instructions and the latest information.

Give Form to the requester. Do not send to the IRS.

Print or type.  
See Specific Instructions on page 3.

1 Name (as shown on your income tax return). Name is required on this line; do not leave this line blank.

**ISH AUTO CRAFT CORPORATION**

2 Business name/disregarded entity name, if different from above

**SCHRADERS AUTO CRAFT**

3 Check appropriate box for federal tax classification of the person whose name is entered on line 1. Check only one of the following seven boxes.

Individual/sole proprietor or single-member LLC     C Corporation     S Corporation     Partnership     Trust/estate

Limited liability company. Enter the tax classification (C=C corporation, S=S corporation, P=Partnership) ►

**Note:** Check the appropriate box in the line above for the tax classification of the single-member owner. Do not check LLC if the LLC is classified as a single-member LLC that is disregarded from the owner unless the owner of the LLC is another LLC that is not disregarded from the owner for U.S. federal tax purposes. Otherwise, a single-member LLC that is disregarded from the owner should check the appropriate box for the tax classification of its owner.

Other (see instructions) ►

5 Address (number, street, and apt. or suite no.) See instructions.

**950 W FOOTHILL BLVD #4**

6 City, state, and ZIP code

**AZUSA, CA 91702**

7 List account number(s) here (optional)

4 Exemptions (codes apply only to certain entities, not individuals; see instructions on page 3):

Exempt payee code (if any) \_\_\_\_\_

Exemption from FATCA reporting code (if any) \_\_\_\_\_

(Applies to accounts maintained outside the U.S.)

Requester's name and address (optional)

**Social security number**

			-		-				
--	--	--	---	--	---	--	--	--	--

or

**Employer identification number**

9	3	-	2	5	4	7	9	7	6
---	---	---	---	---	---	---	---	---	---

## Part I Taxpayer Identification Number (TIN)

Enter your TIN in the appropriate box. The TIN provided must match the name given on line 1 to avoid backup withholding. For individuals, this is generally your social security number (SSN). However, for a resident alien, sole proprietor, or disregarded entity, see the instructions for Part I, later. For other entities, it is your employer identification number (EIN). If you do not have a number, see *How to get a TIN*, later.

**Note:** If the account is in more than one name, see the instructions for line 1. Also see *What Name and Number To Give the Requester* for guidelines on whose number to enter.

## Part II Certification

Under penalties of perjury, I certify that:

1. The number shown on this form is my correct taxpayer identification number (or I am waiting for a number to be issued to me); and
2. I am not subject to backup withholding because: (a) I am exempt from backup withholding, or (b) I have not been notified by the Internal Revenue Service (IRS) that I am subject to backup withholding as a result of a failure to report all interest or dividends, or (c) the IRS has notified me that I am no longer subject to backup withholding; and
3. I am a U.S. citizen or other U.S. person (defined below); and
4. The FATCA code(s) entered on this form (if any) indicating that I am exempt from FATCA reporting is correct.

**Certification instructions.** You must cross out item 2 above if you have been notified by the IRS that you are currently subject to backup withholding because you have failed to report all interest and dividends on your tax return. For real estate transactions, item 2 does not apply. For mortgage interest paid, acquisition or abandonment of secured property, cancellation of debt, contributions to an individual retirement arrangement (IRA), and generally, payments other than interest and dividends, you are not required to sign the certification, but you must provide your correct TIN. See the instructions for Part II, later.

Sign Here	Signature of U.S. person ►	<b>ISMAEL HERNANDEZ</b>
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Date ► **3/19/2025**

## General Instructions

Section references are to the Internal Revenue Code unless otherwise noted.

**Future developments.** For the latest information about developments related to Form W-9 and its instructions, such as legislation enacted after they were published, go to [www.irs.gov/FormW9](http://www.irs.gov/FormW9).

## Purpose of Form

An individual or entity (Form W-9 requester) who is required to file an information return with the IRS must obtain your correct taxpayer identification number (TIN) which may be your social security number (SSN), individual taxpayer identification number (ITIN), adoption taxpayer identification number (ATIN), or employer identification number (EIN), to report on an information return the amount paid to you, or other amount reportable on an information return. Examples of information returns include, but are not limited to, the following.

- Form 1099-INT (interest earned or paid)

- Form 1099-DIV (dividends, including those from stocks or mutual funds)
  - Form 1099-MISC (various types of income, prizes, awards, or gross proceeds)
  - Form 1099-B (stock or mutual fund sales and certain other transactions by brokers)
  - Form 1099-S (proceeds from real estate transactions)
  - Form 1099-K (merchant card and third party network transactions)
  - Form 1098 (home mortgage interest), 1098-E (student loan interest), 1098-T (tuition)
  - Form 1099-C (canceled debt)
  - Form 1099-A (acquisition or abandonment of secured property)
- Use Form W-9 only if you are a U.S. person (including a resident alien), to provide your correct TIN.

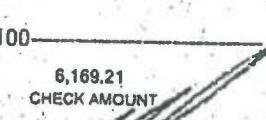
*If you do not return Form W-9 to the requester with a TIN, you might be subject to backup withholding. See What is backup withholding, later.*

**WELLS  
FARGO**

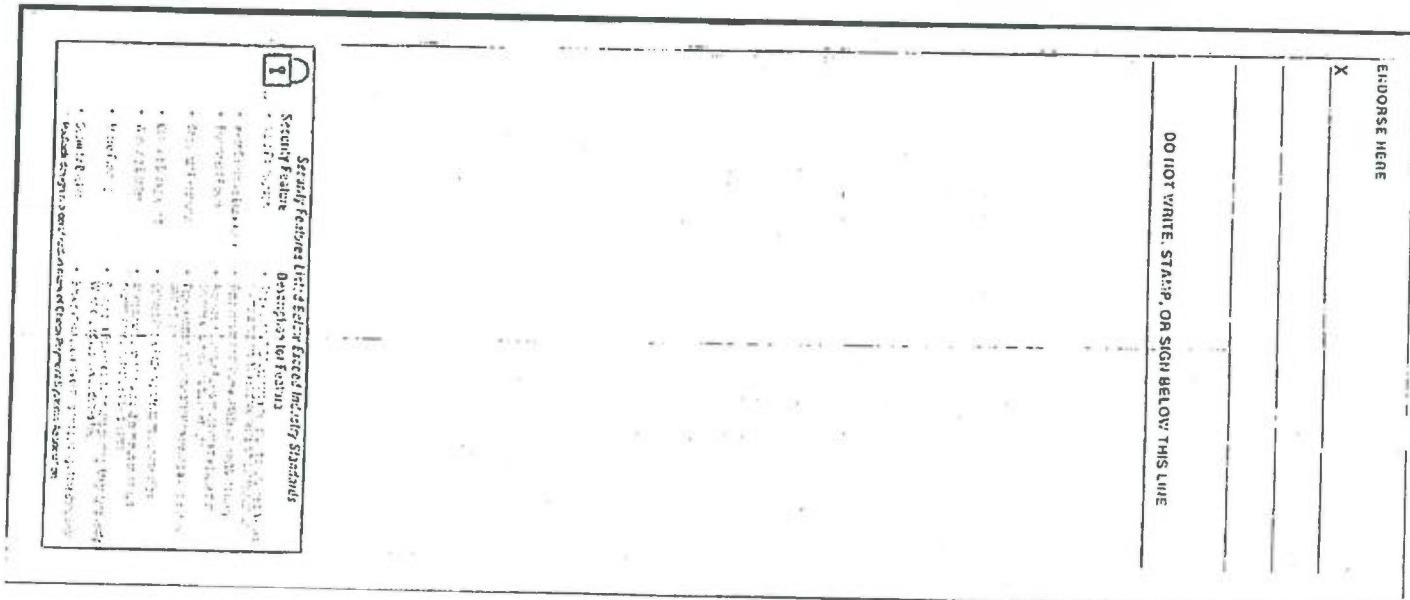
## Lockbox - Transaction Images

### **Transaction 1 Summary**

### **Check 1 Front Image**

WARNING - THIS CHECK IS PROTECTED BY SPECIAL SECURITY GUARD PROGRAM™ FEATURES	
VISION MANAGING GENERAL AGENCY, INC. FOR LOYA CASUALTY INSURANCE COMPANY	
Frost Bank Fort Worth, TX	30-9/1140
40546175	
CLAIMS ACCOUNT 1800 LEE TREVINO EL PASO, TEXAS 79936	843082
VOID IF NOT PRESENTED FOR PAYMENT WITHIN 6 MONTHS FROM DATE OF ISSUE.	
PAY * SIX THOUSAND ONE HUNDRED AND SIXTY NINE DOLLARS AND 21/100	
TO THE ORDER OF	WESTLAKE FINANCIAL SERVICES AND ROBERT LAYFAETTE MANNING
PO BOX 997582 Sacramento, CA 95899-7592	6,169.21
COMMENTS: ITEMS PENDING IF SETTLING ON RETAIN VEHICLE TO BE REMOVED FROM BODY SHOP REASON: PROPERTY DAMAGE PAYMENT YMM VIN# Liability - Property Damage	CHECK AMOUNT  
	02/14/25
	
THIS CHECK CONTAINS MULTIPLE SECURITY FEATURES - SEE BACK FOR DETAILS	
10040546175 1140000930 650031577	

### **Check 1 Back Image**



1885c\\$1841

Exhibit C



Wells Fargo  
P.O. Box 10335  
Des Moines, IA 50306-0335

June 18, 2021

Robert L Manning  
4207 W El Segundo Blvd  
Hawthorne, CA 90250

Subject: Response to your inquiry concerning property address: 8925 S Flower, Los Angeles, CA 90003

Dear Robert L Manning:

Thank you for the opportunity to address your concerns. We want you to know we're here to help. We're responding and want to make sure you have the information you need.

**In the communication received, you expressed concerns about:**

- Construction loan denial
- Foreclosure concerns and your welfare
- Wells Fargo's integrity

We are providing our response to your concerns below.

We've determined the account was handled properly and no corrections are needed as no error has occurred. We'd like to provide you with more information about our resolution.

**Construction loan denial**

You explained that you were denied for a construction loan to a piece of property that legally belongs to you under the fair housing act.

We're unable to find an application with us in your name. We'll need additional details to assist you further. Please send us as much of the following information as possible to help find your account:

- All customer names
- The property address
- The account application number
- The name and phone number of the consultant or representative you worked with
- The city and state of the Wells Fargo Home Mortgage office location

You may submit this information by fax or mail to:

Wells Fargo Home Mortgage  
PO Box 10335  
Des Moines, IA 50306  
Fax: 1-866-278-1179

We can confirm that a lead from Premier One came in for a primary occupancy purchase on June 11, 2021, for a program/product not available making the loan to be unworkable.

Manning  
June 18, 2021  
Page 2

### **Foreclosure concerns and your welfare**

You explained that Wells Fargo has your Assessor's Parcel Number and your name associated with a foreclosure sale for the property located at 8925 S Flower St, Los Angeles, CA 90003. You feel that your life has been in danger and threatened while investigating the foreclosure sale. We're unable to find any records for a foreclosure sale in your name or for the property address located 8925 S Flower St, Los Angeles, CA 90003. The Assessor's Parcel Number is a tax identification number, assigned by the County Tax Collector, in order to pay yearly county/supplemental property taxes on the property.

Please be advised that our foreclosure files are not associated with the Assessor's Parcel Number. The only department that uses the Assessor's Parcel Number is the Escrow/Tax Team.

If you have concerns regarding your welfare you may want to work direct with your local police department.

### **Wells Fargo's integrity**

You stated that Wells Fargo was found guilty for money laundering.

Wells Fargo is committed to rebuilding trust with our customers and has made substantial improvements over the last year including, but not limited to:

- Increased transparency by making system and process enhancements
- Conducting independent reviews of our retail sales practices

We recognize there's more work to be done and our efforts are ongoing. We remain focused on helping our customers succeed financially and apologize your trust in us has been tested. We encourage you to visit our website at [www.wellsfargo.com/commitment/](http://www.wellsfargo.com/commitment/) to learn more about the actions we're taking.

After a thorough review of your concerns, we're unable to find any evidence of any money laundering being completed by Wells Fargo. If you can provide the specific details about how money laundering was committed, please send them to us by fax or mail to the address and fax number provided in the correspondence.

### **Going forward**

We value your feedback and appreciate the time and effort you took to contact us. It's been my goal to fully address the concern you've brought to our attention. If you have any questions, or if you'd like to request additional documents that support our research, you may reply to me directly at the return address on this letter or by phone at 704-248-4672. I am available to assist you Monday through Friday, 8:00 a.m. to 5:00 p.m. Central Time. If you require immediate assistance and I am unavailable, other representatives are available to assist you at 1-800-853-8516, Monday through Friday, 7:00 a.m. to 7:00 p.m. Central Time.

Sincerely,



Taylor Cochran  
Case Specialist  
Home Lending Executive Office  
S09/co12204642/cINA

00000000000000000000000000000000

2

RECORDING REQUESTED BY:

FIRST AMERICAN TITLE INSURANCE COMPANY

\*201010777716\*

AND WHEN RECORDED MAIL TO:

Wells Fargo Bank - Hansen  
100 E. Wisconsin Ave.  
Milwaukee, WI 53202

FRAUD APN: 6038-047-002,  
ACCORDING TO LOS ANGELES  
COUNTY TAX ASSESSOR'S  
OFFICE

Forward Tax Statements To:  
The Address Given Above

TS #: 10-9772-01  
Loan #: 1344342321-208

441057

SPACE ABOVE LINE FOR RECORDERS USE

### TRUSTEE'S DEED UPON SALE

A.P.N.: 6038-047-002 and 6038-004-039

Transfer Tax: \$0.00

"THIS TRANSACTION IS EXEMPT FROM THE REQUIREMENTS OF THE REVENUE AND TAXATION  
CODE, SECTION 480.3"

The Grantee Herein was The Foreclosing Beneficiary.

The Amount of The Unpaid Debt was: \$1,851,508.08

The Amount Paid By The Grantee was: \$192,120.45

Said Property is in the City of Los Angeles, County of Los Angeles

ORTIZ INVESTMENTS  
INCORPORATION, A  
CALIFORNIA CORPORATION'S  
OWNER: EVARISTO ORTIZ.

WT Capital Lender Services, as Trustee, (whereas so designated in the Deed of Trust hereunder more  
particularly described or as duly appointed Trustee) does hereby GRANT and CONVEY to

Wells Fargo Bank, National Association

(herein called Grantee) but without covenant or warranty, expressed or implied, all right title and interest  
conveyed to and now held by it as Trustee under the Deed of Trust in and to the property situated in the county  
of Los Angeles, State of California, described as follows:

THE WEST 40 FEET, FRONT AND REAR OF THE EAST 320 FEET, FRONT AND REAR, OF ALL OF  
LOT(S) 131 OF J.A. KEENEY'S REPLAT OF PARTNERSHIP OF SUNNY SIDE, IN THE CITY OF LOS  
ANGELES, COUNTY OF LOS ANGELES, STATE OF CALIFORNIA, AS PER MAP RECORDED IN BOOK 6  
PAGE(S) 169 OF MAPS, IN THE OFFICE OF THE COUNTY RECORDER OF SAID COUNTY, ALONG  
WITH

THAT PORTION OF LOT(S) 131 OF J.A. KEENEY'S REPLAT OF PARTNERSHIP OF SUNNY SIDE, IN THE  
CITY OF LOS ANGELES, COUNTY OF LOS ANGELES, STATE OF CALIFORNIA, AS PER MAP  
RECORDED IN BOOK 6 PAGE(S) 169 OF MAPS, IN THE OFFICE OF THE COUNTY RECORDER OF SAID  
COUNTY, DESCRIBED AS FOLLOWS:

BEGINNING AT THE NORTHWESTERLY CORNER OF THE WEST 40.00 FEET OF THE EAST 320.00  
FEET OF SAID LOT, THENCE ALONG THE WESTERLY LINE OF SAID WEST 40.00 FEET, SOUTH  
0°03'47" EAST, 150.91 FEET TO THE SOUTHWESTERLY CORNER OF SAID WEST 40.00 FEET. THENCE

d3

Wang Frost Bank FRAUD  
Enterprise Customer Impact

Halder,  
Priyanka

## Enterprise Customer Impact Platform

Submit New Impact

Search

FRAUD COMPLAINT  
(CHECK)

The Impact was successfully submitted

Interaction ID

INTP-032425-776765b4a7c0



Complaint ID

CMPP-032425-f828874ec583



Complaint Type:

LOB Escalated Complaint

Submit New Impact

Cheat casted on  
2-24-25  
so the whole time  
Kingslake Funeral was  
speaking to me , and  
the body shop ,  
they were conducting  
Fraud .

- Frost back ; Blithe

exhibit d4